



# Data privacy statement

## Trustees' commitment to your privacy

The Trustees are committed to protecting and respecting your privacy and rights. This Privacy Statement ("**Statement**") gives you information about how the Trustees will collect and use personal data about you, the circumstances in which they may share or otherwise use the personal data and to whom they may disclose this personal data.

The Trustees are data controllers in respect of the personal data they collect about you for the purposes of data protection legislation (by which we mean the current UK Data Protection Act 1998 and the EU General Data Protection Regulation (EU Regulation 2016/679) ("**GDPR**") which comes into effect on 25 May 2018). The Trustees' address is Savoy Place, London WC2R 0BL.

We will share your information with the Scheme's administrator and professional advisers.

The Scheme's administrator is currently Hymans Robertson LLP. When providing administration services to the Scheme, Hymans acts as a data processor and processes member data on behalf of the Trustees.

Hymans Robertson LLP also provides actuarial and consultancy services, including advice and analytics to the Trustees of the Scheme, including through the Scheme Actuary. When providing actuarial services, the Scheme Actuary and Hymans act as joint data controllers with the Trustees. For more information on these roles, please visit:

[https://www.hymans.co.uk/media/uploads/How\\_Hymans\\_Robertson\\_uses\\_your\\_personal\\_data.pdf](https://www.hymans.co.uk/media/uploads/How_Hymans_Robertson_uses_your_personal_data.pdf).

The Trustees hold a bulk annuity policy issued by an insurer, Just, which relates to certain pensioner members of the Scheme. Just is a data controller in respect of the personal data of those members, who will also receive Just's own privacy statement.

## Information the Trustees may collect from you

The Trustees may collect and process personal data which you provide to them in connection with the Scheme. This may include data about your age, date of birth, gender and marital status. Also included may be your length of employment with the Institution of Engineering and Technology ("**IET**") group and details of your dependents and other persons in your household, and your contact details (e.g. residential address, email address and telephone number).

In addition, we may collect, hold and use personal data about you that are a sensitive nature ("**Sensitive Personal Data**") such as medical information about you.

## Information the Trustees may collect about you from the IET group or third parties

The Trustees may collect personal data about you from the IET group or third parties. This may include information relating to your employment, your salary and your benefits, to the extent relevant to your pension and related arrangements. Periodically, the Trustees may collect personal data relating to you from third parties such as former employers or regulatory authorities.

## Purposes for which and the basis upon which the Trustees will process your personal data

The Trustees will process your personal data and the personal data of other persons (e.g. your dependants) provided by you to us in connection with the administration of benefits of your pension and related benefit entitlements arising as a result of your employment with the IET group.

Generally, the Trustees will rely upon the "legitimate interests" ground as the legal basis for processing your personal data. This means that the Trustees will process personal data for the legitimate interests of themselves

or a third party to whom they may disclose personal data in accordance with this Statement. The legitimate interests are the administration of the Scheme in order to pay each member's benefits (provided always that the legitimate interests are not overridden by the interests or fundamental rights or freedoms of Scheme members (or others) which may require protection of personal data).

Where the Trustees are required to process Sensitive Personal Data, they will approach you or the relevant individuals for specific consent to the processing of such data.

### Retention of personal data

The Trustees will hold personal data of Scheme members and their dependants for as long as may be necessary in order to administer benefit entitlements and for the purposes of maintaining records of steps the Trustees have taken to comply with their obligations under the Scheme. Inevitably, this means that personal data may be retained by the Trustees for extremely long periods of time, including after entitlement to receive benefits by an individual and/or their beneficiaries has ceased. The end date for holding data in respect of a particular member is expected to be 75 years from the date on which the last payment is made to or in respect of that member.

### Disclosure of personal data

Hymans Robertson is engaged by the Trustees to provide administration services for the Scheme. The Trustee will also engage tracing agencies, a scheme actuary, lawyers and accountants and similar external advisors to assist them. The Trustees may disclose your personal data to these third parties in connection with services provided by the third parties to the Trustees. The Trustees may also share your information with the IET and their professional advisers in connection with its responsibilities towards the Scheme.

At all times, the Trustees will ensure that the personal data is processed in accordance with their instructions and in circumstances which require the recipient to observe industry standard security measures in respect of the personal data.

The Trustees may also disclose your personal information to third parties in the following types of situations:

1. in the event that they wish to enter a buy-out/buy-in of any of the benefits under the Schemes, in which case they may disclose your personal data to the prospective counterparty to such a transaction; or
2. if they are under a duty to disclose or share your personal data in order to comply with any legal obligation.

### International transfers of personal data

As required by data protection legislation, the Trustees have strict security procedures regarding the storage and disclosure of personal data. The personal data that they collect about you may be transferred to, and stored at, or processed in, one or more countries outside the European Economic Area ("EEA") which has not yet been deemed by the European Commission to offer adequate data protection. It may also be processed by staff operating outside the EEA who work for the Trustees or for our third parties. In such cases, the Trustees will take steps to ensure an adequate level of data protection in the country of the recipient as required under the GDPR.

If the Trustees decide that personal data does need to be transferred to a country outside the EEA which does not offer adequate protection, the Trustees will notify you in writing and ensure that appropriate technical and organisational measures are put in place so that such processing meets the requirements of the data protection legislation. If the Trustees cannot ensure such an adequate level of data protection, your personal data will not be transferred outside the EEA.

### Automated decision-making

The Trustees do not envisage that any decisions will be taken about you using automated means. In the event that this position changes, we will notify you in writing.



### Your rights under the EU General Data Protection Regulation

You have rights under the GDPR, including:

- the right to access your personal data;
- the right to have your personal data rectified if it is inaccurate or incomplete;
- the right to have your personal data deleted or removed if there is no reason for its continued storage and processing;
- the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances;
- the right to request the transfer of your personal data to another party;
- where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent.

However, if you ask the Trustees to erase or stop processing your personal data, they may be unable to properly administer the Scheme or process any benefits for you, and if they have compelling legal grounds to continue to process your personal data, they may continue to do so. You may address your requests to the Scheme's Administrator, Hymans Robertson LLP, at 45 Church Street, Birmingham B3 2RT.

### Changes to this Statement

The Trustees reserve the right to change this Statement and any other relevant policies or procedures at any time without notice to you. Any changes we may make to this Statement in the future will be notified to you and you are advised to regularly check and review the Statement to ensure you understand how we may be processing your personal data. Any changes the Trustees may make to this Statement (which will, unless otherwise indicated, apply to any personal data already obtained by the Trustees before the changes were made) will be effective from the date on which those changes have been notified to you. Where appropriate, they may also notify you of any changes made by e-mail.

### Data Protection

The Trustees will not disclose or transfer personal data to third parties for the purposes of marketing.

### Contact

If you have any questions concerning this Statement or the policies or procedures referred to above, please contact the Trustees via the Scheme's Administrator, Hymans Robertson LLP, at 45 Church Street, Birmingham B3 2RT.

Where you are dissatisfied with any aspect of our handling of your personal data you have a right to lodge a complaint with the Information Commissioner's Office. Their contact details are:

Address: Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113 or 01625 545 745  
Fax: 01625 524 510  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)